



Blendhub

**PROTOCOL OF OPERATION
AND MANAGEMENT OF THE
ETICHS LINE**

Control Change

Version	Date	Reason for change
Draft	07/02/2020	Draft Protocol and User Guide
1.0	11/03/2020	Rules of operation and management of the Ethics Line and User Guide

Document information

Version	Drawn up by	Reviewed by	Approved by
Draft	David Cortijo	Juan Ignacio Ruiz Zorrilla	Security and Compliance Committee
1.0	David Cortijo	Juan Ignacio Ruiz Zorrilla	Security and Compliance Committee

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1. Introduction

1.1 Object and purpose

Blendhub S.L. (hereinafter, Blendhub) makes available to its employees, managers, temporary staff, fellows, suppliers, customers and other interested third parties, an Ethics Line /Whistleblower Channel to communicate confidentially, through an App for mobile devices and a website, those potentially irregular activities and behaviors that may lead to non-compliance with the Code of Ethics and Conduct, the different Corporate Policies or the rest of the internal regulations of Blendhub, and /or those behaviors that may lead to the commission of a crime.

Communications will always be confidential, and may be anonymous, if so desired, the inclusion of the complainant's personal data is not mandatory.

The responsibility of the Ethics Line corresponds to Blendhub, through the Security and Compliance Committee, which externalizes the management of the Line.

The Ethics Line is managed by an external, independent company specialized in the management of complaints, Compliance and Criminal Law; and provides the platform via web and App for mobile devices. This external company is also in charge of interacting with Blendhub's Security and Compliance Committee throughout the management of the complaint /communication. It also guarantees the confidentiality of communications and the preservation of anonymity (in the case of anonymous complaints).

1.2 Basic Principles of Action

- Confidentiality Guarantee: Absolute confidentiality of the complainant's data is guaranteed in non-anonymous complaints. All those people who, in the subsequent investigation as a result of the communications, know all or part of the content of the same are also subject to the commitment of confidentiality.
- Guarantee of anonymity: The confidentiality and anonymity of the complainant's data is guaranteed in anonymous complaints.
- Prohibition of retaliation: Blendhub will not exercise or tolerate any type of retaliation against the complainant or those who participate or collaborate in the investigation of communications or complaints.
- False complaints: False communications or those made in bad faith will be investigated and will be subject to the appropriate disciplinary measures.

- Employee collaboration: Employees must collaborate diligently in the investigation of communications received when so required.
- App /Web: Communications /Complaints are made through an App available for free download on Android mobile devices on the Google Play Store, and for iOS mobile devices on the App Store. You can also access the Ethics Line platform through web access, through the following link: <https://blendhub.shogunmonitor.com/>
- External management: The management of the communications sent will be carried out confidentially, independently and impartially by specialized professionals from a company external to Blendhub.

1.3 Scope

The scope of the Ethics Line and the scope of application of this protocol apply to all activities related to Regulatory Compliance and compliance with the Code of Ethics and Conduct of Blendhub S.L.

1.4 Security and Compliance Committee

The Blendhub Security and Compliance Committee is the highest body responsible for ensuring Regulatory Compliance in the Company, this includes its responsibility on the Ethics Line. This is the Committee responsible for monitoring, controlling and resolving complaints and communications received through the Ethics Line or any other means.

For its part, the management of the Ethics Line is carried out by an external company independently and confidentially. In addition, the Committee will rely on external experts to carry out its functions when, due to the specificity of the matter or the circumstances, it is necessary, as well as to safeguard independence and avoid conflicts of interest in decision-making.

2. Operation of the Ethics Line

2.1 Access to the Ethics Line

Communications /complaints will be sent through the App available for free download on Android mobile devices on the Google Play Store, and for iOS mobile devices on the App Store. You can find the App by entering "Blendhub Ethics Line" in the search engine of the aforementioned digital stores (Google Play Store and App Store). You can also access the Ethics Line platform online, through the following link: <https://blendhub.shogunmonitor.com/>.

To resolve any queries regarding the Ethics Line and access to it, the email address ethicsline@blendhub.com is available. This email address will be for inquiries only and is not the way to communicate possible breaches of the Code of Ethics and Conduct, Regulations or Legislation.

Annex I indicates, in more detail, the process of downloading the App or accessing it via the website.

2.2 Identification of irregularity/irregularities

If a person, whether an employee, manager, temporary staff, intern, supplier, client or other interested third party, has knowledge or suspicion of the existence of irregular conduct or activity, contrary to criminal law, non-compliance with the internal law of Blendhub, or any other activity or behavior that is unlawful or contrary to the Company's ethical principles and values (enshrined in the Code of Ethics and Conduct) must communicate it, as soon as possible.

It is important to review the Blendhub Code of Ethics and Conduct, as well as the different policies, procedures and other internal regulations of the Company in order to know the ethical principles of the company and the behaviors or activities which are permitted and not permitted.

The Blendhub Ethics Line, through its App or via the website, constitutes the main mean of communication and reporting of this type of situations. The communication may also be made in person before the hierarchical superior or a member of the Company's Management, but always as an alternative way and in cases where, for a justified reason, it is not possible or convenient to access the platform of the Ethics Line. The hierarchical superior or the manager must enter it on the platform on behalf of the person who has communicated it, indicating that this has been the process followed. As an alternative, the person interested

in reporting any event may request another person they trust to report it on their behalf, indicating that this has been the process followed.

2.3 Communication of irregularity/irregularities

The person who has knowledge or suspicions of irregular, illicit or criminal behaviors must report it through the following channels:

- Firstly, through the Blendhub Ethics Line App (available for Android and iOS) or the web version of it (<https://blendhub.shogunmonitor.com/>). This route, in addition, allows anonymous reporting, if desired.
- Secondly, and in case of not being able to access the platform through the App or web, communicating it personally and directly to any member of the Security and Compliance Committee, Company Director or the person in charge of the corresponding area. They will be responsible for collecting it in writing, along with the name and signature of the complainant, and enter it on the platform on behalf of that person.

Alternatively, the person interested in reporting / reporting any event may request another person they trust to report it on their behalf, indicating that this has been the process followed.

The guide for downloading and using the App is found in Annex 1.

2.4 Content of the communication/ complaint

Communications or complaints should be as detailed and descriptive as possible. Through the Ethics Line platform, either through App or web access, you can attach all kinds of files (videos, images, recordings, documents, etc.) that are deemed appropriate to demonstrate or help to demonstrate what has been communicated or denounced.

The communication /complaint should detail, as far as possible:

- Which is the irregular behavior?
- The person/persons involved.
- The date or period in which the events took place.
- The means that could have been used to carry out the irregular conduct.
- Areas /departments of the Company that are affected or that may have any implication.

Regarding the name of the complainant, the following two ways of complaints are possible:

o Anonymous complaint /communication: If desired, it is not necessary to include the name of the complainant. In these cases, the “Name of the Complainant” field will be left empty and the complaint will be anonymous. In this type of complaint /communication, the personal data of the complainants will not be known in any case and, therefore, their identity will be unknown.

o Nominative complaint /communication: In order to do this, the real and complete name and surname of the complainant must be entered in the “Name of the Complainant” field. In this form of complaint /communication, the complainant consents to their identity being known.

In the event that the complaint /communication does not contain the necessary information to carry out an investigation, the Manager of the platform will initiate a chat with the complainant (either anonymously or by name) to request more information. The complainant must provide the information, through chat on the App, within 14 days. If after this period no response is obtained from the complainant, the complaint /communication will be discarded, provided that no risk is derived from the information received.

2.5 Admission, management and investigation phase

Once the complaint /communication has been received, it will be verified that it contains enough data to support the investigation. In any case, the Manager (of the platform) will notify the complainant of the reading of each communication /complaint, at the time it is made, through a chat generated on the platform (both via App and web).

The Manager (of the platform) will collect the information and send it to the Blendhub Security and Compliance Committee, assigning a priority (high, medium or low) to the communication /complaint received, depending on the irregularities reported and the persons involved.

In the event that the complaint /communication involves specific persons in the organization, the Manager (of the platform) will proceed to check whether those people are members of the Security and Compliance Committee, before sending the information. In the event that the complaint /communication affects one or more members of the Security and Compliance Committee, the information will be sent only to one of the members of the Security and Compliance Committee not involved. In the event that it affects, to a greater or lesser extent, all the members of the Security and Compliance Committee, the information will be sent to the CEO of the Company. For this purpose, the Manager of the

complaint /communication must be warned, at all times, by the Company, of the composition and contact of the members of the Security and Compliance Committee and the CEO of Blendhub.

In any case, when the complaint is anonymous, anonymity will be maintained throughout the process. Whereas, if the complainant /communicator has chosen to include their name, it will imply that their name is visible throughout the process and that they can be summoned to obtain more information and collaborate in the investigation.

Throughout the entire process, the Manager (of the platform) and the complainant may communicate through the chat generated on the platform, in order to obtain more information or clarify doubts.

Once communicated and examined the information by the Manager of the complaint /communication, the Security and Compliance Committee (or, when appropriate, one of its members or the CEO of the Company), within 30 days from when the communication from the Manager (of the platform) was received, it will decide, in a motivated way, the treatment to be given to the complaint /communication received, in accordance with the following:

1. In the event that it considers that the facts denounced /communicated do not constitute any infraction or irregularity, it will agree to file the complaint.
2. In the event that it considers that the facts denounced /communicated may constitute an infraction or irregularity, the investigation of the facts will proceed.
3. In the event that it considers that the facts reported /communicated could constitute a disciplinary infraction or contrary to the Code of Ethics and Conduct or to any internal regulation of Blendhub, it will be forwarded to the competent body for processing the corresponding procedure.

The 30-day period may be extended, in exceptional circumstances, and must always be justified.

Throughout this process, the Security and Compliance Committee (or, when appropriate, one of its members or the Company's CEO) may request the collaboration of the complainant and any other employee who can provide information of any type about the facts reported. The investigation will follow guidelines that allow the preservation of evidence, respect for the rights of workers and the guarantee of confidentiality with respect to the information and the people involved. In addition, it will be established, case by case, which departments or areas should be informed of the investigation and at what hierarchical level.

2.6 Elaboration of the Report

Once the complaint /communication has been managed, investigated and the treatment of it has been decided, the Security and Compliance Committee will issue a report of conclusions that contains the list of the facts, the procedure followed, the results of the investigation, the decisions taken, the corresponding corrective measures and, when appropriate, recommendations or proposals to improve the control, supervision, evaluation and updating of the Blendhub Criminal Risk Prevention Model (CRPM).

2.7 Communication to the complainant

The Security and Compliance Committee, unless there are circumstances that advise or justify that the communication does not take place, will inform the complainant of the measures taken regarding their communication /complaint, in the event that it is a nominal complaint.

3. Protection of whistleblowers and the denounced

The Security and Compliance Committee of Blendhub will ensure that there is no retaliation of any kind on that person/s who make communications /complaints. In the event that it is shown that any person/persons have been subject to retaliation of any kind, an investigation will be carried out in this regard and, where appropriate, the author or authors of it will be sanctioned.

In the same way, maximum confidentiality is guaranteed in the management and investigation of the communications /complaints received. Therefore, in order to protect the identity of the accused and other persons involved, as well as their reputation, only those strictly necessary will be informed.

4. Prohibitions

Using Blendhub Ethics Line in bad faith is an inadmissible practice. Any misuse of the Ethics Line will be prosecuted and investigated. Consequently, the communication /reporting of false or fabricated facts is totally forbidden.

It is also prohibited to use the Ethics Line in order to make claims, complaints or requests for issues other than those indicated in this Protocol.

5. Personal Data Protection

Blendhub and the Manager of the platform undertake to treat, at all times, the personal data received through the Ethics Line in an absolutely confidential manner and in accordance with the purposes set forth in this procedure and will adopt the necessary technical and organizational measures to guarantee the security of the data and avoid its alteration, loss, treatment or unauthorized access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed, all in compliance with the provisions in the General Data Protection Regulation (EU) and in the LO 3/2018, of December 5th, on Personal Data Protection and guarantee of digital rights (Spain).

The people who make any communication /complaint through the Ethics Line guarantee that the personal data provided is true, exact, complete and up-to-date. In any case, the data that will be processed in the framework of the investigations will be canceled as soon as they have been completed, unless administrative or judicial procedures result from the measures adopted. Likewise, the Security and Compliance Committee will keep the aforementioned data duly blocked during the periods in which the complaints or the actions carried out as a result of these could derive responsibilities.

6. Queries

Any questions or queries about the operation or use of the Ethics Line can be resolved by accessing the platform (via App or web) and reviewing the documents and user guides included therein (material that was disseminated among employees in the implementation of the Ethics Line) and to Annex 1 of this document.

If this is not enough to resolve any doubts, you can make your inquiries by writing to ethicsline@blendhub.com. In any case, **this email is not the correct way to communicate or complain**, it only may be used to solve questions related to the use of the Ethics Line.

7. Approval and entry into force

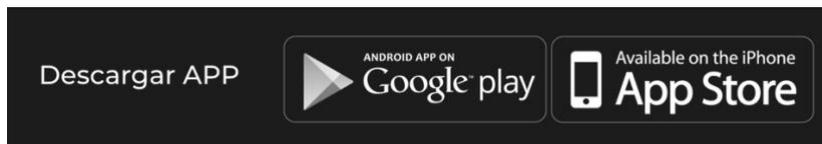
The Security and Compliance Committee of Blendhub S.L. approves, on 11th March, 2020, this "Protocol of operation and management of the Ethics Line", coming into force on 12th March, 2020.

ANNEX 1
-USER GUIDE-
ETHICS LINE PLATFORM
(via the website/App)

STEP 1: Download the App from the online store.

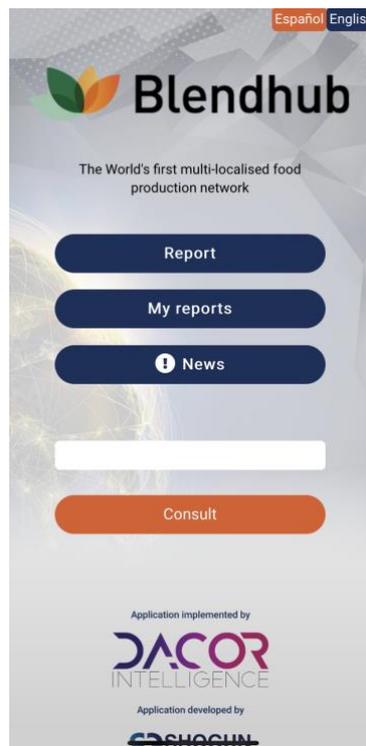
There are two ways to download the App:

- Typing in the search bar of [Google Play](#) (for Android) or of the [App Store](#) (for iOS-iPhone) "Blendhub Ethics Line". Then download the App.
- Access the following website on your mobile phone: <https://shogunmonitor.com/blendhub.html> and click on the Google Play logo (for Android) or the App Store (for iOS-iPhone), located at bottom of the website. Then download the App.



This is how it appears at the bottom of the website.

STEP 2: Start App on the mobile device or access to the website.



Opening screen of the App.

In case of access via the website, it will be done through the following link:

<https://blendhub.shogunmonitor.com/>.

STEP 3: Choose the Language.

In the upper right corner, you can choose the language of the App / web by clicking on "Español" for the Spanish version, or "English" for the English version.



Parte superior de la pantalla inicial de la App.

STEP 4: Make a complaint /communication.

Firstly, on the initial screen of the App / web, click on the "Report" button.



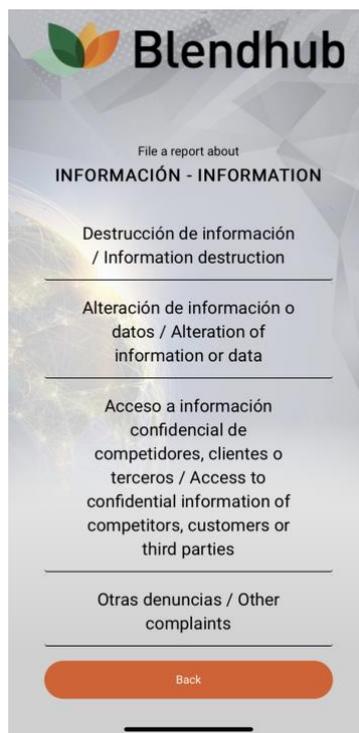
Button to start the complaint / communication.

Then, another menu appears with the different categories or activities on which the complaint /communication will be made. These categories are indicative, if you do not know in which of them you can include the complaint /communication or if it is a different category or activity, choose the category "Other complaints".



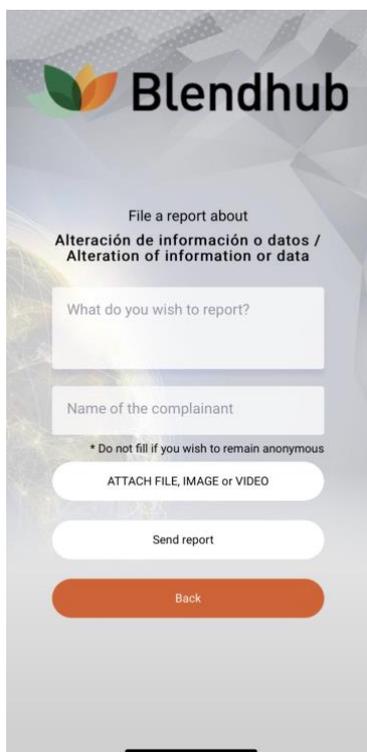
Menu of categories /activities on which to report /communicate.

Once the category /activity has been chosen, another menu is accessed, which includes subcategories related to the previously selected category. Again, these subcategories are indicative, if you do not know in which of them you can include the complaint /communication or if it is a different subcategory, choose the subcategory “Other complaints”.



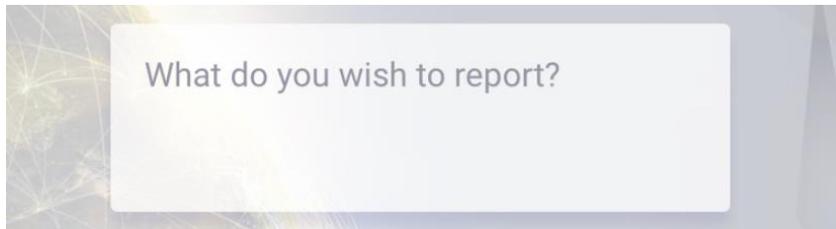
Menu of subcategories about which the complaint /communication is made.

After selecting the desired category and subcategory, a third menu appears corresponding to the complaint /communication as such.



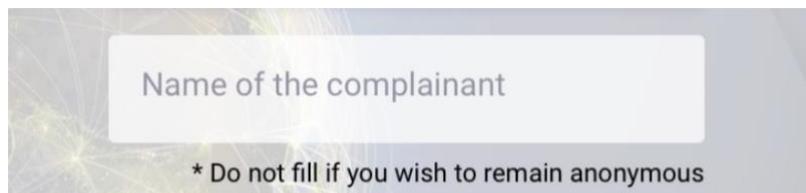
Main screen of the report.

On this screen, the “What do you wish to report?” field must be filled in, in writing? This is where you have to write all the information that can be provided in relation to the irregularity that you want to report, following this Protocol.



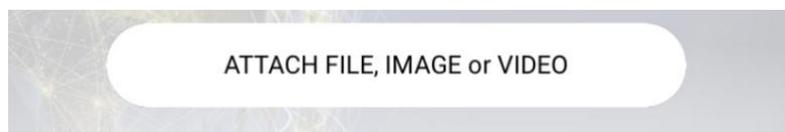
Text field to fill in (mandatory).

Then, there is the “Name of the complainant” field. It is not mandatory to fill in this field. If you want the complaint /communication to be anonymous, we must leave this field empty. If, on the other hand, we want to make a report /communication by name, we must write our real name and surname.



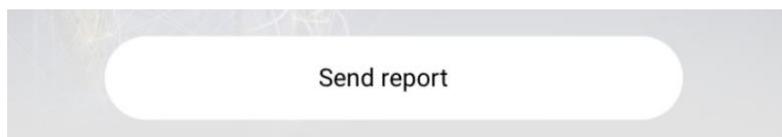
Text field to be filled only if you want the report not to be anonymous.

It is possible to attach any type of files (images, recordings, videos, documents, etc.) to the complaint /communication. It can be done by clicking on “ATTACH FILE, IMAGE OR VIDEO”. It is not compulsory but providing any evidence about what is reported is recommended.



Press to attach any type of file from your mobile device.

Once the complaint / communication is finished, click on "Send report" to send it to the Manager of the Platform.



Press to send the complaint /communication from your mobile device.

To end the process and send the complaint /communication it is necessary to accept the Terms and Conditions of Use of the App /web (which can be reviewed by clicking on the link that appears on the screen). Fill in the box confirming that these terms and conditions have been read and accepted and click on "Accept".

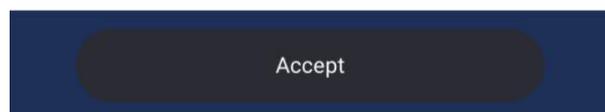
Notice

To continue you have to accept the terms and conditions.

Follow the link to know more:

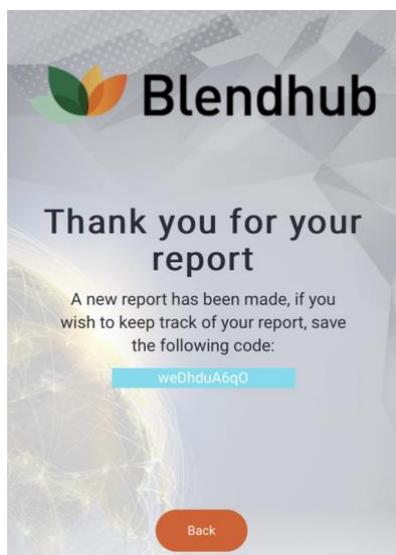
[Términos y Condiciones de Uso](#)

I have read and accept the terms and conditions
He leído y acepto los Términos y Condiciones de Uso



Notice that appears on the screen to accept the Terms and Conditions of Use of the App / web.

Finally, a message will appear announcing that a new complaint has been generated:



A **complaint tracking code** appears on this screen. This code is unique and independent for each complaint /communication, it is generated randomly so that it does not identify anything or anyone. It is important to write it down in a safe place to be able to follow up on the complaint made and, in addition, communicate with the Manager of Platform through a chat on the App /web itself.



Example of code generated after making a complaint /communication.

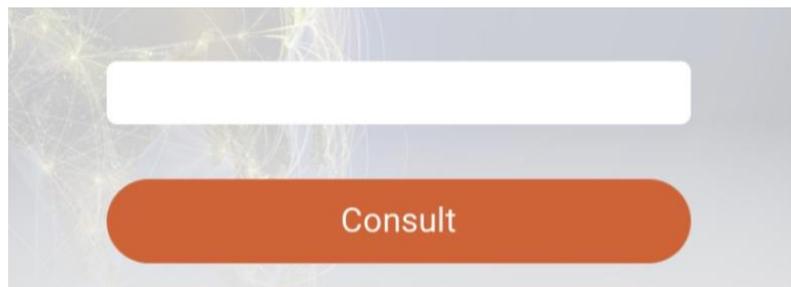
STEP 5: Review the complaints /communications sent and the communications received from the Manager of the Platform.

By reviewing the complaints /communications we can find out the status of their management, communicate with the Manager of the Platform to contribute or receive new information, or answer the Manager's questions in the generated chat.

There are two ways to review the complaints /communications that we have already sent:

Option 1: By code.

On the initial screen of the App /web we must enter the code, that we keep when sending the report, in the blank field located at the bottom and click "Consult".



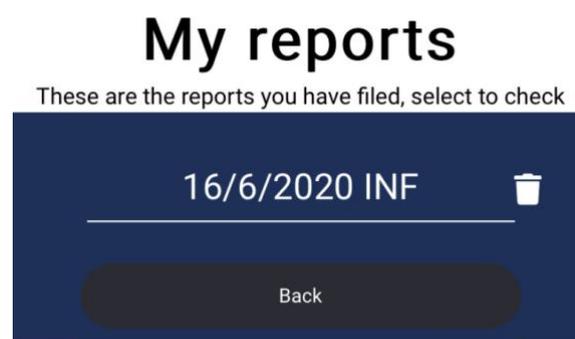
Blank field located on the initial page of the App /web in which to enter the code.

Option 2: Accessing "My reports" (solo via App).

To review the complaints /communications already sent, we can also go to the main screen of the App /web and click on "My reports".



Next, the complaints /communications that have been sent from your mobile device through the App will appear.



IMPORTANT: If you want to eliminate the trace of the complaints /communications issued from that device, you need to click on the trash can icon located to the right of each of the reports. Once this action has been carried out, they can only be accessed through the code that was generated when the complaint /communication was sent for the first time.

To access the desired report, we must click on the corresponding one.